

159725



**LLANTAS  
TORNEL**

CALIDAD SIGNIFICA PROGRESO

DEPT. OF TRANSPORTATION  
DOCKETS

02 MAR 12 AM 11:15

March 11<sup>TH</sup> 2002

**Docket Management  
Room PL-401  
400 Seventh Street, SW  
Washington, DC 20590**

**To Whom It May Concern:**

49 CFR Parts 567, 571, 574 and 575  
[Docket No. NHTSA – 01 – 11157] - 39  
Proposed Labeling Requirements, TIN

The proposed rule currently indicates a length dimension of 1.25" for the six characters involved in the plant code and the four digits indicating week and year of manufacture. The diagram on Page 65565 has the exemplar XX XXXX covering a maximum of 1.25". We are writing to ask that the agency consider modifying the proposed rule to allow a maximum distance of 2.5" for these first six characters.

Our current system has each of these six characters engraved on six individual plugs. This configuration allows us to minimize material usage by allowing us to reuse numeric plugs for a finite number of cycles. The proposed 1.25" maximum dimension would require we put more than one digit per plug or an oblong plug. This would require single week plugs and use much more aluminum.

The obvious implication of our six (6) single digit plug configuration is that there must be sufficient mold material BETWEEN plugs to support each. In our case that would be 0.080" between each plug hole. We have attached two renderings. The first labeled "Tread Act Requirement" is the proposed rule as shown on page 65565. The other is our "Proposal" and is labeled such.

The intent of the legislation and proposed rule overall was to enhance the tire consumers ability to identify a tire that had been designated for recall. The extension of permissible length of the critical letter and numbers from 1.25" to 2.50" we believe would not hinder this intent. Rather we believe it may even enhance the visual acuity of this information. We are NOT proposing any consideration regarding letter size or font, only the length covered by the first six characters in the new configuration.

**Cía. Hulera Tornel S.A. de C.V.**

Ave. Santa Lucia # 198 Azcapotzalco, CP 02760 México D.F., México.  
Tel. (52) 55 5354-0200 ext 2901 (52) 55 5353-3194 Fax. (52) 55 5561-0097  
rtornel@tornel.com.mx



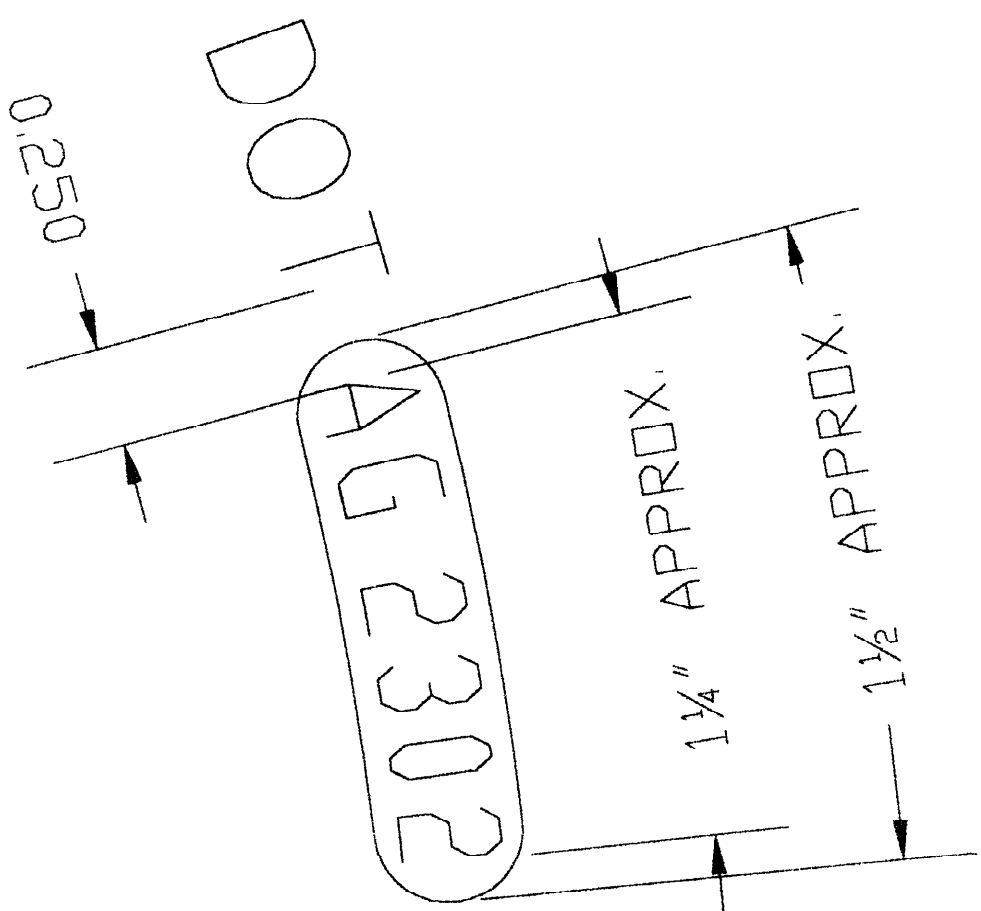
CALIDAD SIGNIFICA PROGRESO

The relaxation of the 1.25" maximum in the proposed rule would allow us to use current technology and sources. A 2.50" maximum length would allow us to incorporate the new requirements in the least amount of time, with the lowest cost and require the least employee training.

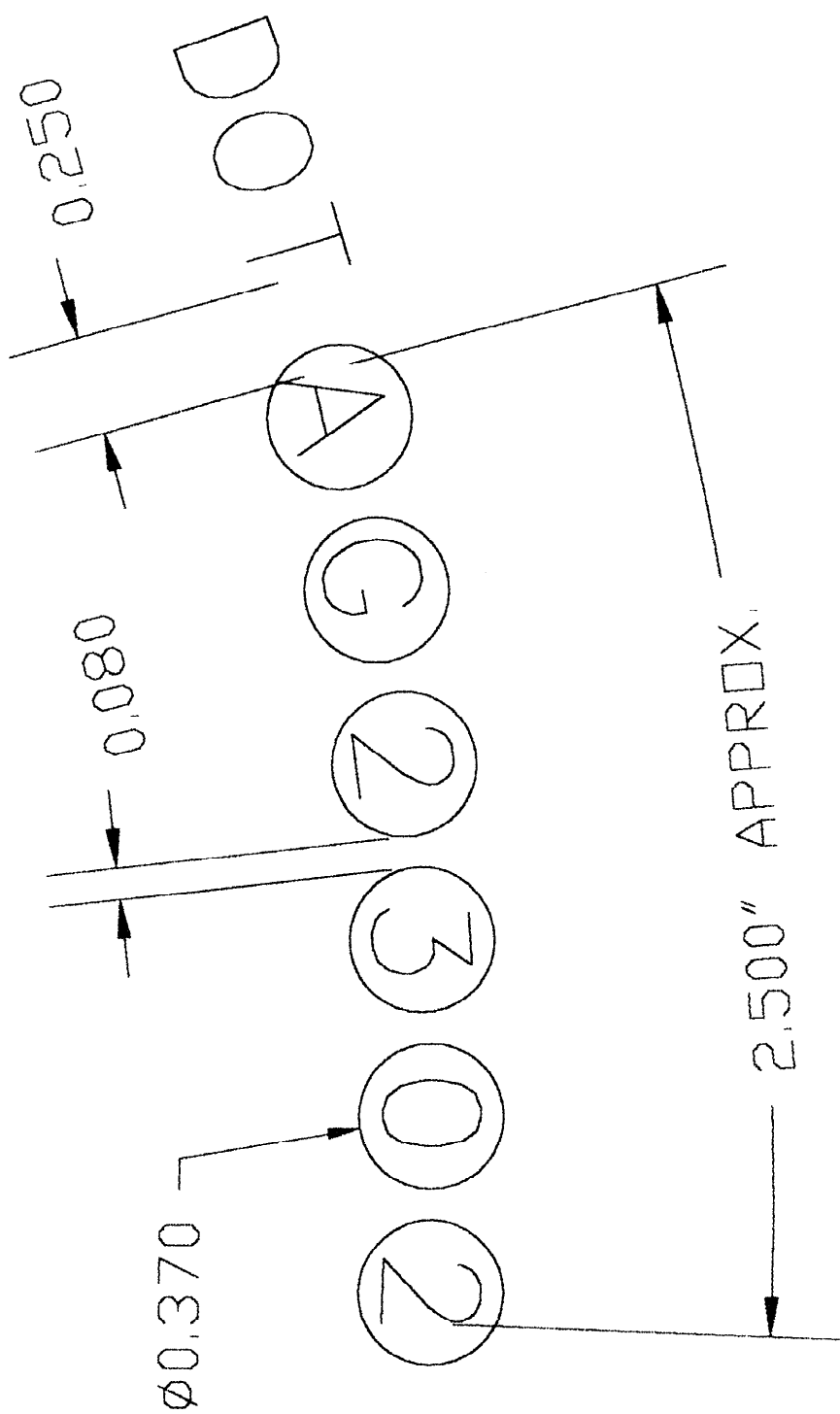
We applaud the agencies intent embodied in this proposed rule to enhance consumer safety and knowledge of tires. We ask the agencies kind consideration for this minor modification to the rule sincerely believing it does not run counter in any way to the spirit and intent of the rule while allowing minimal impact to our process and people.

**RAUL TORNEL C.**  
**Operations Director**  
**La Hulera Tornel S.A. de C.V.**

Ave. Santa Lucia # 198 Azcapotzalco, CP 02760 México D.F., México.  
Tel. (52) 55 5354-0200 ext 2901 (52) 55 5353-3194 Fax. (52) 55 5561-0097  
rtornel@tornel.com.mx



TREAD ACT REQUIREMENT



PROPOSAL